

1 The Honorable Thomas S. Zilly
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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

F.L.B., a minor, by and through his Next Friend,
Casey Trupin, et al.,

Plaintiffs-Petitioners,

v.

Loretta E. LYNCH, Attorney General, United
States, et al.,

Defendants-Respondents.

Case No. 2:14-cv-01026-TSZ

**DECLARATION OF GLENDA M.
ALDANA MADRID**

I, Glenda M. Aldana Madrid, declare as follows:

1. I am an attorney with the Northwest Immigrant Rights Project and counsel for
Plaintiffs in the above-captioned action. I make this declaration based on my own personal
knowledge and in support of the Plaintiffs' Reply in Support of Plaintiffs' Renewed Motion for
Class Certification. I am over the age of eighteen, have personal knowledge of the facts stated
herein, and can testify competently to the facts herein if called as a witness.

2. On Friday, November 13, 2015, I queried an online database at the Transactional
Records Access Clearinghouse ("TRAC") website, titled *Juveniles—Immigration Court Deportation*

1 *Proceedings*, <http://trac.syr.edu/phptools/immigration/juvenile/> [hereinafter “TRAC Juveniles

2 Database”]. I conducted this query to determine the number of children (1) whose cases were

3 initiated in Fiscal Year 2014; (2) who had legal representation in their immigration proceedings; and

4 (3) who were allowed to remain in the United States. This query revealed that of the 31,689

5 represented children whose cases were initiated in FY2014, 19,531 still had their cases pending

6 before the immigration courts. Of the 12,158 children whose cases had been concluded, 10,320 (or

7 84.88%) had been allowed to remain in the United States. Attached as Exhibit A is a true and correct

8 copy of the results of this query.

9

10 3. I then sought to conduct the same query, but for unrepresented children. Specifically,

11 I queried the TRAC Juveniles Database for the number of children (1) whose cases were initiated in

12 Fiscal Year 2014; (2) who were *not* represented in their immigration proceedings; and (3) who were

13 allowed to remain in the United States. This query revealed that of the 30,962 pro se children whose

14 cases were initiated in FY2014, 16,858 still had their cases pending before the immigration courts.

15 Of the 14,104 children whose cases had been concluded, 1,414 (or 10.03%) had been allowed to

16 remain in the United States. Attached as Exhibit B is a true and correct copy of the results of this

17 query.

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19 4. I then sought to conduct the same two queries, but for the year 2015. Specifically, I

20 queried the TRAC Juveniles Database for the number of children (1) whose cases were initiated in

21 Fiscal Year 2015; (2) who had legal representation in their immigration proceedings; and (3) who

22 were allowed to remain in the United States. This query revealed that of the 9,259 represented

23 children whose cases had been initiated in FY2015, 7,272 still had their cases pending before the

24 immigration courts. Of the 1,987 children whose cases had been concluded, 1,354 (or 68.14%) had

25

1 been allowed to remain in the United States. Attached as Exhibit C is a true and correct copy of the
 2 results of this query.

3 5. To complete my summary for the year 2015, I did the same query for unrepresented
 4 children. Specifically, I queried the TRAC Juveniles Database for the number of children (1) whose
 5 cases were initiated in Fiscal Year 2015; (2) who were *not* represented in their immigration
 6 proceedings; and (3) who were allowed to remain in the United States. This query revealed that of
 7 the 15,353 pro se children whose cases had been initiated in FY2015, 11,870 still had their cases
 8 pending before the immigration courts. Of the 3,483 children whose cases had been concluded, 237
 9 (or 6.8%) had been allowed to remain in the United States. Attached as Exhibit D is a true and
 10 correct copy of the results of this query.

11 6. Finally, I obtained aggregate figures for both represented and unrepresented children
 12 whose cases had been initiated and concluded in fiscal years 2014 and 2015 who had been allowed
 13 to remain in the United States.

14 7. For unrepresented children, I combined the total number of children who had been
 15 allowed to remain for FY2014 (1,414) and FY2015 (237), and divided that number by the total
 16 number of those children whose cases had been concluded in FY2014 (14,104) and FY2015 (3,483).
 17 I obtained an aggregate percentage of **9.4**.

18 8. For represented children, I combined the total number of children who had been
 19 allowed to remain for FY2014 (10,320) and FY2015 (1,354), and divided that number by the total
 20 number of those children whose cases had been concluded in FY2014 (12,158) and FY2015
 21 (1,987). I obtained an aggregate percent of **82.5**.

22 9. Attached hereto as Exhibit E is a true and correct excerpted copy of the transcript of
 23 the deposition of Steven C. Lang, Esq., dated October 15, 2015. Mr. Lang testified on behalf of

1 Defendant Department of Justice pursuant to Federal Rule of Civil Procedure 30(b)(6). I am in
2 possession of the entire transcript, and would make it available to the Court upon request.

3 10. Attached hereto as Exhibit F is a true and correct excerpted copy of the transcript of
4 the deposition of Honorable Jack H. Weil, dated October 15, 2015. Mr. Weil spoke on behalf of
5 Defendant Department of Justice pursuant to Federal Rule of Civil Procedure 30(b)(6). I am in
6 possession of the entire transcript, and would make it available to the Court upon request.

7 11. Attached hereto as Exhibit G is a true and correct excerpted copy of the Vera Institute
8 of Justice's *DCS Legal Access Project Final Report: August 1, 2009 – January 31, 2015* (May
9 2015). Plaintiffs obtained this document from Defendants through discovery.

10 I declare under penalty of perjury of the laws of the State of Washington and the United
11 States that the foregoing is true and correct to the best of my knowledge and belief.

12 14 Executed this 13th day of November, in Seattle, Washington.

13 
14 GLENDA M. ALDANA MADRID, ESQ.
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CERTIFICATE OF ECF FILING AND SERVICE

I hereby certify that on November 13, 2015, I arranged for electronic filing of the foregoing document and accompanying exhibits with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record:

s/ Glenda M. Aldana Madrid
Glenda M. Aldana Madrid, WSBA No. 46987
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